

COHN LIFLAND PEARLMAN
HERRMANN & KNOPF LLP
Peter S. Pearlman
Matthew F. Gately
Park 80 Plaza West-One
250 Pehle Avenue, Suite 401
Saddle Brook, New Jersey 07663
Telephone: (201) 845-9600
Facsimile: (201) 845-9423

Counsel for Movants and Proposed Liaison Counsel

[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SCOTT STERLING, individually and
on behalf of all others similarly
situated,

Plaintiff,

vs.

IRIS ENERGY LIMITED, DANIEL
ROBERTS, WILLIAM ROBERTS,
BELINDA NUCIFORA, DAVID
BARTHOLOMEW, CHRISTOPHER
GUZOWSKI, and MICHAEL
ALFRED,

Defendants.

Case No. 2:22-cv-7273-JMV-MAH

Honorable John Michael Vazquez

Class Action

MOTION DAY: March 20, 2023

ORAL ARGUMENT REQUESTED

**Motion of Network Racing Pty Ltd., Nahi Beaini, LRJ
Superannuation Fund, and De Stoop Investments
Pty Ltd. for Appointment of Lead Plaintiff and
for Approval of Selection of Lead Counsel**

PLEASE TAKE NOTICE that, under Section 27(a)(3)(B) of the Securities Act of 1933, 15 U.S.C § 77z-1(a)(3)(B), and Section 21D(a)(3)(B) of the Securities and Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995, movants Network Racing Pty Ltd., Nahi Beaini, LRJ Superannuation Fund, and De Stoop Investments Pty Ltd. (together the "IREN Investor Group") will move, on March 20, 2023, or as soon thereafter as the matter may be heard before the Honorable John Michael Vazquez, in Courtroom PO 03 of the Martin Luther King Building & United States Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for entry of an order:

- (1) appointing the IREN Investor Group as a group or in the alternative, any of the group members individually as lead plaintiff in this action;
- (2) approving the group's selection of Bottini & Bottini, Inc. as lead counsel, and Cohn Lifland Pearlman Herrmann & Knopf LLP as liaison counsel; and

(3) granting such other and further relief as the Court deems just and proper.

In support of this motion, the IREN Investor Group submits the accompanying memorandum of law and the Declaration of Albert Y. Chang (with Exhibits 1 through 6), and a [Proposed] Order, and relies on all papers and proceedings in this action.

Dated: February 13, 2023

Respectfully submitted,

COHN LIFLAND PEARLMAN

HERRMANN & KNOPF LLP

Peter S. Pearlman

Matthew F. Gately

s/ Peter S. Pearlman

Peter S. Pearlman

Park 80 Plaza West-One

250 Pehle Avenue, Suite 401

Saddle Brook, New Jersey 07663

Telephone: (201) 845-9600

Facsimile: (201) 845-9423

Email: psp@njlawfirm.com
mfg@njlawfirm.com

*Counsel for Movants Network Racing
Pty Ltd., Nahi Beaini, LRJ
Superannuation Fund, and De Stoop
Investments Pty Ltd. and Proposed
Liaison Counsel*

BOTTINI & BOTTINI, INC.
Francis A. Bottini, Jr.
(*pro hac vice* forthcoming)
Albert Y. Chang
(*pro hac vice* forthcoming)
7817 Ivanhoe Avenue, Suite 102
La Jolla, California 92037
Telephone: (858) 914-2001
Facsimile: (858) 914-2002
Email: fbottini@bottinilaw.com
achang@bottinilaw.com

*Counsel for Movants Network Racing
Pty Ltd., Nahi Beaini, LRJ
Superannuation Fund, and De Stoop
Investments Pty Ltd. and Proposed Lead
Counsel for the Class*